

Message

From: Chin, Lucita [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EA404E3F56574242AEE0811A07E309FC-CHIN, LUCITA]
Sent: 3/16/2016 12:33:24 PM
To: Engelman, Alexa [ENGELMAN.ALEXA@EPA.GOV]
Subject: RE: Question on Class I AE's

We have approved AEs for Class I injection purposes. There are several in Wyoming; most of them are for disposal of uranium ISR activities. Christensen Ranch wells did not have to drill deeper. Wyoming has typically made arguments as to why the aquifers below the injection zone are not USDWs, and our AEs allowed the injection zone to be the lowermost USDW.

I know that our program has issued other Class I non-haz well AEs as well, but I cannot recall off the top of my head what activities those wells are associated with.

Ex. 5 AC/DP

Hope that helps! Let me know if you have any other questions.

From: Engelman, Alexa
Sent: Tuesday, March 15, 2016 6:56 PM
To: Chin, Lucita <Chin.Lucita@epa.gov>
Subject: Question on Class I AE's

Lucita-

Hello, hope you're well! I wanted to check back in on a conversation we had last summer about R8 considering AE's for Class I wells. I'm trying to answer the question; has EPA granted AE's for Class I injection purposes?

I know you mentioned that this was proposed for Christenson Ranch wells, and I saw a letter from the R8 ARA (Tuber) to WDEQ bouncing back request for AE's for Class I wells. I think you said R8 made them drill those wells deeper, or was WY granted an AE's for those wells?

Likewise I think you said for Dewey Burdock Class I waste was essentially injected as Class V waste due to the ban on deep well injection? Were there AE's associated with these specific wells? I know DB had Class III wells with an associated AE if I recall correctly.

We're discussing this with our RC tomorrow morning at 9:30, not essential to have an answer but realized I hadn't really run to ground the question of precedent on this in R8.

Thanks, as always!
Alexa

Alexa Engelman, Esq.
U.S. Environmental Protection Agency

Region IX Office of Regional Counsel

75 Hawthorne Street, ORC-2
San Francisco, CA 94105
Phone: (415) 972-3884
Fax: (415) 947-3570

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